



STATE OF IDAHO

DEPARTMENT OF AGRICULTURE

DIRK KEMPTHORNE
Governor

PATRICK A. TAKASUGI
Director

November 1, 2004

R2 Grizzly Bear FP Amendments
c/o USFS Content Analysis Team
P O Box 22810
Salt Lake City, UT 84122-2810

To Whom It May Concern,

The Idaho State Department of Agriculture (ISDA) appreciates the opportunity to review and comment on the Forest Plan Amendments for Grizzly Bear Conservation for the Greater Yellowstone Area National Forests, Draft Environmental Impact Statement (DEIS). The planning team has obviously put much time and effort into developing a plan that will comply with the Grizzly Bear Recovery Plan and the established state recovery plans. After careful evaluation of the DEIS, ISDA is providing the following comments to assist the Forest Service in producing the best possible Forest Plan Amendments for the affected area. ISDA comments will mainly be limited to the Targhee National Forest Plan, but general comments may apply to all areas.

General:

ISDA would like to express our appreciation for the efforts the team has put forth in developing a comprehensive plan for the management of Grizzly Bear habitat, while maintaining focus on the multiple-use of our forests. ISDA recognizes that species recovery, while an important consideration in the management of our national forest lands, is not, and should not be, the overriding focus in the forest-wide management plans. The team has also melded the existing federal and state conservation plans with the National Forest Plans to maximize the effectiveness of existing conditions with as little interruption of current methods of operation as possible.

Chapter 1:

On page 3 of Chapter 1 it states, "The USFWS has developed habitat criteria that will be added to the Recovery Plan before any proposal for delisting. Those criteria are the same standards identified in the proposed action..." While the criteria identified in the proposed action are general practices that are currently in existence in much of the bear habitat, the same criteria are not listed in all alternatives. ISDA is concerned that if any alternative, other than the proposed, is chosen the habitat standards will change as well, potentially making the state plans inconsistent with the Amended Forest Plans.

Also on page 3 it states, "USFWS biological opinions on the forest plans and amendments for the six GYA national forests have consistently noted that the implementation of the plans are not likely to jeopardize the continued existence of the grizzly bear in the GYA." This further supports the need to remove Alternatives 3 & 4 from consideration.

Chapter2:

The comments for chapter 2 will follow the format of the Components of the Alternatives (Figure 8) pages 39-42. Each comment will focus on the implications of all alternatives and will address only those issues with differing direction, unless otherwise stated.

Goal: The plan to manage grizzly bear habitat within the Primary Conservation Area (PCA) to sustain the recovered Yellowstone population is a viable goal so long as it is within the area defined in the recovery plan.

The area defined in Alternative 4 is outside the bounds of the recovery plan and therefore should not apply. Management of bears outside the PCA is addressed in the state level management plans and must not be altered unless coordinated with the States.

Secure Habitat: Maintenance of secure habitat, based on a baseline area equivalent to the 1998 delineation for secure habitat within the recovery plan, is adequate for the continued viability of the species. Any increase in the area set aside for the future expansion of the bears should be left up to the individual states. As stated on page 27, "Activities that do not require road construction, reconstruction, opening of a restricted road, or recurring helicopter flights at low elevation do not detract from secure habitat." The flexibility to provide for management on a mitigated basis must remain at the local level, as all activities occurring would be analyzed through the NEPA process.

Developed Sites: The baseline of 1998 has been established throughout the DEIS and should be maintained. The ability of local managers to respond to the local use of the forests must remain intact. Any future developments will be analyzed using the NEPA process therefore restrictions on speculated future development is not recommended. ISDA recommends that the flexibility to administer developed recreation sites be maintained by following the process identified in the proposed action.

Livestock Grazing: The use of phase-out grazing strategies as defined in the DEIS is sufficient to maintaining habitat requirements of the bears. The creation of new or enlarged areas of grazing restriction, as stated in Alternatives three and four, is not warranted nor needed for the continued viability of the bears. The populations of bears within the recovery units have met the recovery goals and therefore should be managed by the state wildlife management agencies. ISDA opposes any increase in the restrictions on grazing allotments.

The Standards and Guidelines: Standard four has been removed from use, with the exception of the Targhee National Forest, due to the integration of the management situation lines throughout the forest plan. The forest plan should be updated to reflect the current management language in this DEIS as soon as possible.

Motorized Access: Motorized access control should be maintained at the local level. Local managers have the ability and responsibility to manage their areas to maintain multiple-use. Access to areas should be based on the needs of the resource, with the local authority having the ability to open areas for resource management and recreation demands. Mitigation should be used when appropriate to maintain suitable grizzly habitat.

Recreation conflicts: Multiple-use of our National Forest lands is the underlying mandate for management. Recreation is and will continue to be an increasing demand on the forest resources. Elimination of developed and dispersed campsites would effectively remove portions of the National Forest lands from management under multiple-use. ISDA recommends that there be no closures of existing recreation facilities. Future development of recreation sites will be analyzed using the NEPA process.

Food Sources: The current habitat available to grizzly bears has allowed the populations to reach recovery objectives throughout the DEIS area. Maintenance of current food source areas should continue with management activities directed to provide the required food resource within the currently identified areas.

Monitoring: Monitoring is a critical part of any management action. The level of monitoring that is required to ensure effectiveness and validation of plans and actions should be funded and given priority at the local level. ISDA recommends that the monitoring objectives for items one through 4 include the entire PCA. However, if managers at the local level determine the need to expand monitoring efforts, they must have the flexibility to do so.

Chapter 3:

The information on the environmental consequences appears to be complete and accurate, with the following exceptions. The number of allotments potentially affected by alternatives 3 and 4 are not acceptable. While Alternative 3 states that only four allotments will be closed, it does not disclose the potential impacts on cattle allotments that would result as the bear populations expand. The closure of cattle allotments with recurring livestock/grizzly bear conflicts, based on the history from 1992 through 2003 is 17, and therefore the immediate

consequence of this alternative would almost certainly close those allotments in addition to the 4 sheep allotments disclosed in figure 52, on page 132. The number of allotments affected by Alternative 4, at least 79 allotments with 232,260 Animal Months (AMs), is excessive and not necessary. The PCA was established to give the bears a large enough area to meet recovery goals and those bears that expand their range outside of the PCA should be managed according to the state management plans. The Forest Service must make full disclosure of allotments that meet the criteria for closure under all alternatives throughout the EIS and not just inside the text of chapter 3.

The Economic Environment, Section 3.14, starting page 199, gives an overall assessment of what has happened economically within the area since 1970, but it does not account for the overall affects to the local populace. The numbers presented illustrate a much larger shift of families income away from agriculture than has been experienced. Due to the influx of retirement and second homeowners the economic figures are skewed and not representative of the change in the number of households that rely on agricultural incomes. ISDA recommends the Forest Service conduct an economic base analysis of the area. This will provide the number of households affected by the Forest Plan Amendment and give an assessment of the economic indicators based on resident households, not just dollars.

Summary:

The disclosure of the effects on the environment, and the uses of the areas affected by the alternatives appear to be comprehensive. The information as it pertains to the needs of the bears and existing conditions leads one to understand that the current rules and stipulations in the management plans, for the PCA, are having the desired affects. ISDA recommends that the forest plans be brought into uniformity with each other as detailed in Alternative two, the proposed alternative. If you have any questions, please call Bob Hales at (208) 525-7040.

Sincerely,

John Chatburn
Deputy Administrator
Division of Animal Industries
ISDA